

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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MOOG INC.,

Plaintiff,

v.

Case No.: \_\_\_\_\_

SKYRYSE, INC., ROBERT ALIN  
PILKINGTON, MISOOK KIM, and DOES NOS. 1-50,

Defendants.

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**MOOG’S WITNESS LIST FOR PRELIMINARY INJUNCTION HEARING**

Pursuant to Local Rule of Civil Procedure 65(a)(4), Moog Inc. (“Moog”) hereby identifies the witnesses it intends to call at the preliminary injunction hearing. Moog expressly reserves its right to amend or supplement this witness list based on information learned during discovery or argument.

**MOOG'S WITNESS LIST**

<b>No.</b>	<b>Witness</b>	<b>Title and Affiliation</b>	<b>Anticipated Subjects of Testimony</b>
1.	Michael Hunter	Senior Software Manager  Moog	<ul style="list-style-type: none"> <li>• Development of Moog's Platform software and project-specific applications.</li> <li>• Value of Moog's Platform software and project-specific applications.</li> <li>• Efforts to keep certain data related to Moog's Platform software and project-specific applications secret.</li> <li>• Skyrise's recruitment efforts of Moog's employees, and the Moog employees who have left for Skyrise.</li> <li>• Misook Kim's copying of Moog's data on November 19, 2021, as well as the contents of what was copied.</li> <li>• Job duties and roles of Defendants Robert Alin Pilkington and Misook Kim at the time of their departure from Moog.</li> <li>• Ms. Kim's departure from Moog and signed exit form.</li> <li>• Irreparable harm faced by Moog.</li> </ul>
2.	Todd Schmidt	Principal Engineer  Moog	<ul style="list-style-type: none"> <li>• Development of Moog's Platform software and project-specific applications.</li> <li>• Communications with Gonzalo Rey regarding potential employment at Skyrise.</li> <li>• Misook Kim's copying of Moog's data on November 19, 2021, as well as the contents of what was copied.</li> <li>• Skyrise's recruitment efforts of Moog's employees, and the Moog employees who have left for Skyrise.</li> <li>• Irreparable harm faced by Moog.</li> </ul>

No.	Witness	Title and Affiliation	Anticipated Subjects of Testimony
3.	Paul Stoelting	Director, AG Growth & Innovation  Moog	<ul style="list-style-type: none"> <li>• Exploring business opportunity with Skyryse in 2018.</li> <li>• Non-Disclosure Agreements entered into between Moog and Skyryse.</li> <li>• Statement of Work and other agreements entered into between Moog and Skyryse.</li> <li>• Skyryse's new business plan beginning in 2019.</li> <li>• End of business relationship between Moog and Skyryse.</li> </ul>
4.	Jorge Lopez	Software Chief Engineer  Moog	<ul style="list-style-type: none"> <li>• Recruitment by Skyryse.</li> <li>• Working with Defendant Pilkington.</li> <li>• Misook Kim's copying of Moog's data on November 19, 2021, as well as the contents of what was copied.</li> <li>• Skyryse's recruitment efforts of Moog's employees, and the Moog employees who have left for Skyryse.</li> <li>• Irreparable harm faced by Moog.</li> <li>• Moog's investment into Platform, various iterations thereof, and certain project-specific applications.</li> </ul>
5.	Jamie Daly	HR Business Partner  Moog	<ul style="list-style-type: none"> <li>• Misook Kim's signed exit form.</li> <li>• Communications with Kim in February 2022 regarding return of the external hard drive used by Ms. Kim to copy Moog's data.</li> </ul>

No.	Witness	Title and Affiliation	Anticipated Subjects of Testimony
6.	Ian Bagnald	Security Operations Manager  Moog	<ul style="list-style-type: none"> <li>Investigation into Moog employees departing for Skyrise.</li> <li>Misook Kim's copying of Moog's data on November 19, 2021, as well as the contents of what was copied.</li> <li>The two external hard drives returned by Kim to Moog.</li> <li>The custody and status of the external hard drives returned by Kim to Moog.</li> </ul>
7.	William Michael Johnnie	AG Director of Engineering  Moog	<ul style="list-style-type: none"> <li>Retrieval of two external hard drive devices from Misook Kim.</li> <li>Location, specifications, and custody of the two external hard drive devices returned to Moog by Misook Kim.</li> <li>Location, custody, and physical condition of Misook Kim's two Moog-issued laptops.</li> </ul>
8.	Bruce Pixley	Owner  Pixley Forensics Group	<ul style="list-style-type: none"> <li>Forensic images of the two external hard drives returned by Misook Kim to Moog.</li> <li>Analysis of physical and forensic images of the two external hard drives returned by Misook Kim to Moog.</li> <li>Analysis of physical and forensic images of Misook Kim's two Moog-issued laptop devices.</li> </ul>

No.	Witness	Title and Affiliation	Anticipated Subjects of Testimony
9.	Misook Kim	Senior Software Engineer, Flight Controls  Skyryse	<ul style="list-style-type: none"> <li>• Kim's role and job responsibilities at Moog, including her credentials and access to Moog's data.</li> <li>• Moog's efforts to keep its data secret, including but not limited to its Employee Handbook, trade secret trainings, IP policy, exit form, etc.</li> <li>• Copying of Moog's data on 11/19/21.</li> <li>• Communications with Pilkington following his departure from Moog.</li> <li>• Communications with Moog following her departure from Moog on 12/17/21.</li> <li>• Deleting the Moog data she copied.</li> <li>• Return of two wiped external hard drives to Moog.</li> <li>• Any access, disclosure, or subsequent use of Moog's data after Kim copied it on 11/19/21.</li> <li>• Kim's current role and job responsibilities at Skyryse.</li> <li>• Skyryse's current business plans and software engineering projects.</li> </ul>

No.	Witness	Title and Affiliation	Anticipated Subjects of Testimony
10.	Robert Alin Pilkington	Software Manager, Flight Controls  Skyryse	<ul style="list-style-type: none"> <li>• Pilkington's role and job responsibilities at Moog, including his credentials and access to Moog's data.</li> <li>• Moog's efforts to keep its data secret, including but not limited to its Employee Handbook, trade secret trainings, IP policy, etc.</li> <li>• Communications with Kim following Pilkington's departure from Moog.</li> <li>• Any access, disclosure, or subsequent use of Moog's data after Kim copied it on 11/19/21.</li> <li>• Pilkington's current role and job responsibilities at Skyryse.</li> <li>• Skyryse's recruitment and hiring of Moog's employees.</li> <li>• Skyryse's current business plans and software engineering projects.</li> </ul>

No.	Witness	Title and Affiliation	Anticipated Subjects of Testimony
11.	Gonzalo Rey	CTO  Skyryse	<ul style="list-style-type: none"> <li>• Rey's role and job responsibilities at Moog, including his credentials and access to Moog's data.</li> <li>• Moog's efforts to keep its data secret, including but not limited to its Employee Handbook, trade secret trainings, IP policy, etc.</li> <li>• Rey's departure from Moog and decision to join Skyryse.</li> <li>• Joint venture between Moog and Skyryse in 2018-2019.</li> <li>• Skyryse's change in business plan in 2019.</li> <li>• Communications with Kim and Pilkington beginning in 2021.</li> <li>• Any access, disclosure, or subsequent use of Moog's data after Kim copied it on 11/19/21.</li> <li>• Rey's current role and job responsibilities at Skyryse.</li> <li>• Skyryse's recruitment and hiring of Moog's employees.</li> <li>• Skyryse's current business plans and software engineering projects.</li> </ul>

No.	Witness	Title and Affiliation	Anticipated Subjects of Testimony
12.	Person Most Knowledgeable (Fed. R. Civ. P 30(b)(6))	Skyryse Representative	<ul style="list-style-type: none"> <li>• Skyryse's formation.</li> <li>• Skyryse's initial business plans in 2018.</li> <li>• Joint venture between Moog and Skyryse in 2018-2019.</li> <li>• Skyryse's change in business plan in 2019.</li> <li>• Skyryse's venture capital financings and communications/representations to investors.</li> <li>• Skyryse's recruitment and hiring of Moog's employees.</li> <li>• Any access, disclosure, or subsequent use of Moog's data after Kim copied it on 11/19/21.</li> <li>• Skyryse's current business plans and software engineering projects.</li> </ul>



Date: March 7, 2022

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